

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC BLACK MOUNTAIN WATER)	
DISTRICT UNACCOUNTED FOR WATER LOSS)	CASE NO.
REDUCTION PLAN, SURCHARGE, AND)	2023-00202
MONITORING)	

**RESPONSES TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO BLACK MOUNTAIN UTILITY DISTRICT DATED
OCTOBER 7, 2024**

Filed: October 25, 2024

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

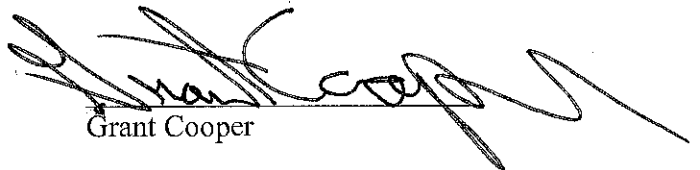
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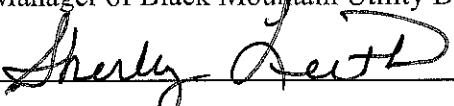
VERIFICATION OF GRANT COOPER

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF HARLAN)

Grant Cooper, General Manager of Black Mountain Utility District, being duly sworn, states that he has supervised the preparation of certain responses to Commission Staff's Third Request for Information in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.


Grant Cooper

The foregoing Verification was signed, acknowledged and sworn to before me this ____ day of October 2024, by Grant Cooper, General Manager of Black Mountain Utility District.



Notary Commission No. KYN 087495

Commission expiration: April 8, 2028

**BLACK MOUNTAIN UTILITY DISTRICT
PSC CASE NO. 2023-00202
RESPONSE TO THIRD REQUEST FOR INFORMATION**

Request 1. Refer to Black Mountain District’s response to Commission Staff’s Second Request for Information, Item 4c.

- a. Confirm whether Black Mountain District still asserts that the purchase of an additional listening device referenced under subsection 1 is necessary, following the approval of the purchases of an AQUASCOPE Water Leak Detector granted by Order issued May 30, 2024 and an AQUA TEST 10-SDR water leak detector by Order issued August 15, 2024. If so, explain why the additional listening device is necessary.
- b. Explain whether Black Mountain District is currently in the process of identifying areas of old copper lines prone to leaks referenced under subsection 5.
 - (1) If so, explain the process of how those areas have been identified, provide a list of those locations, and a break-down of the expenses involved in locating these areas, and whether Black Mountain District proposes to utilize water loss surcharge funds towards those expenses.
 - (2) If not, explain when Black Mountain District plans to begin its efforts to locate these areas and whether it proposes to utilize water loss surcharge funds towards expenses related to location of these areas
- c. Explain what Black Mountain District means specifically for item 6 listed: “Utilize casing on problem areas where there are continual leaks.” Include in the response details regarding how casing will reduce water loss and how Black Mountain District intends to install the casing on existing piping.
- d. Explain whether Black Mountain District is currently in the process of utilizing casing on problem areas where there are continual leaks.
 - (1) If so, provide an explanation of when this practice began, as well as a list of the problem areas where continual leaks have been identified and casing has been utilized and the costs associated with this project.

(2) If not, explain when Black Mountain District plans to begin its efforts to utilize casing on areas of continual leaks, and whether it proposes to utilize water loss surcharge funds towards expenses related to this project.

Response 1(a): On August 15, 2024¹, the Commission granted Black Mountain's request to purchase the AQUA TEST 10-SDR. Black Mountain has purchased that device and has been utilizing the device for leak detection. Black Mountain still believes that an additional leak detection device would assist in leak discovery, but it at this time Black Mountain is not requesting approval for an additional leak detection device.

Response 1(b)(1): There are 108 copper lines in the Putney area of Black Mountain's system. At this point, Black Mountain believes it will require 5,500 feet of CTS line to replace the copper lines. To identify the copper lines, it took one Black Mountain employee 160 hours for a total of \$5,824.85 (160 hours x \$24.50/hour + maintenance and fuel to drive 459 miles at \$4.15/mile). The employee inspected the meter pit supply line to determine if copper pipe was used from the main to the setter. Black Mountain anticipates requesting permission to utilize surcharge proceeds for this amount. As of October 25, 2024, Black Mountain does not have an estimate of cost of replacing the copper pipes.

Please see Attachment 1(b)(1) for an invoice of the cost to identify the copper pipes.

Response 1(b)(2): Please see Response 1(b)(1).

Response 1(c): Casing refers to excavating the problem service line from the main to the setter and installing a 2 inch PVC pipe to run the ¾ inch CTS or 1 inch CTS pipe through. This process allows the PVS pipe to protect the CTS pipe in rocky areas or from being compressed in high traffic areas. In areas where Black Mountain has taken the casing approach, no additional leaks or breaks in the line have occurred. Before using this method, CTS pipe in rocky or high traffic area would leak several times a year. Black Mountain anticipates continuing to use the casing method in areas that are rocky or high traffic.

¹ Case No. 2023-00202, August 15, 2024 Order (Ky. PSC Aug. 15, 2024).

Response 1(d)(1): Black Mountain began casing in December 2023 in areas that had continuous leaks even after repairs. This information was submitted to the Commission for reimbursement in the first request to use water loss surcharge proceeds and it was approved.² As of October 25, 2024, any area where Black Mountain has used the casing approach there have been no leaks on those service lines.

Response 1(d)(2): Please see Response 1(d)(1). Black Mountain will continue to seek reimbursement from water loss surcharge proceeds when using the casing method to repair areas of the system.

² Case No. 2023-00202, Motion to Use Surcharge Proceeds (filed April 22, 2024) and Case No. 2023-00202, May 30, 2024 Order (Ky. PSC May 30, 2024).

ATTACHMENT 1(b)(1)

BLACK MOUNTAIN UTILITY DISTRICT

609 FOUR MILE ROAD

BAXTER KY 40806

Phone: (606) 573-1277

DATE

LOCATING PROBLEM COPPER LINE

DESCRIPTION	PER	QTY	UNIT PRICE	AMOUNT
LABOR	HR	160.00	\$24.50	\$3,920.00
MOBIL FLEET FUEL AND MAIN. #T03	MILE	459.00	\$4.15	\$1,904.85
				\$0.00
				\$0.00
				\$0.00
				\$0.00
				\$0.00
				\$0.00
				\$0.00
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DISCRITION OF WORK DONE

SUBTOTAL 5,824.85
TOTAL \$ 5,824.85